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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ROUTE CONSULTANTS, INC., a Tennessee corporation; CRYPTO QUO, LLC, a Tennessee limited liability company; and BLOCKLEAF LLC, a Wyoming limited liability company,

Plaintiffs,

v.

E3 NV, LLC, a Nevada limited liability company; WILLIAM MURDOCK, an individual,

Defendants.

CASE No.: 2:23-cv-01703-CDS-EJY

**STIPULATION AND ORDER TO ATTEND
SETTLEMENT CONFERENCE AND TO
EXTEND DISCOVERY CUTOFF TO
CONDUCT TWO REMAINING
DEPOSITIONS**

(SECOND REQUEST)

Plaintiffs Route Consultants, Inc. ("RC"), Crypto Quo, LLC ("Crypto Quo"), and Blockleaf, LLC ("Blockleaf") and Defendants E3 NV, LLC ("E3") and William Murdock ("Murdock") and (collectively referred as the "Parties"), by and through their undersigned counsel of record, hereby submit this Stipulated Request for Extension of Discovery, pursuant to FRCP 6(b) and 16(b), as well as LR 26-3 and LR IA 6-1.

WHEREAS, this is the Parties' second request for an extension of discovery deadlines.

WHEREAS, on July 18, 2024, the Court entered an Order granting a Stipulated Request for Extension of Discovery Deadlines (First Request) (ECF No. 27), such that discovery deadlines were extended by approximately 60 days as follows:

Discovery Cut-Off – November 21, 2024

1 Amend Pleadings and Add Parties – June 21, 2024 (unchanged)

2 Expert Disclosures – August 21, 2024

3 Rebuttal Expert Disclosures –October 21, 2024

4 Dispositive Motions –January 10, 2025

5 Proposed Joint Pretrial Order – February 10, 2025, or 30 days after the final dispositive motions
6 is ruled upon.

7 The Parties have almost completed discovery, with only two expert depositions remaining. The
8 parties would like to postpone such depositions and engage in a settlement conference, or a private
9 mediation if a settlement conference cannot be scheduled before the end of 2024. The parties would
10 like to extend the deadline to complete these two expert depositions, only, until January 31, 2024 to
11 avoid the costs of such depositions and allow the settlement conference the greatest chance of success.

12 WHEREAS, pursuant to LR 26-3, the Parties agree on the following:

13 (a) **Statement of discovery completed:** The following discovery has been completed:

14 • Disclosures

15 ○ Plaintiff Blockleaf LLC initial disclosures served March 5, 2024, First
16 Supplemental Disclosures on July 18, 2024, Second Supplemental Disclosures
17 on August 27, 2024 and Third Supplemental Disclosures on September 16,
18 2024.

19 ○ Defendants' Initial Disclosures served March 18, 2024; First Supplement served
20 March 22, 2024; Second Supplement served April 19, 2024; and Third
21 Supplement served June 10, 2024.

22 ○ Plaintiff Route Consultants Inc., and Crypto Quo, LLC initial disclosures served
23 July 8, 2024.

24 • Written Discovery

25 ○ Discovery Responses from Defendants to Plaintiffs' first set of Interrogatories,
26 Admissions and Production of Documents served March 11, 2024.

27 ○ Discovery Responses from Defendants to Plaintiffs' second set of
28 Interrogatories, Admissions and Production of Documents served April 1, 2024.

- Discovery Responses from Plaintiffs to Defendants' first set of Interrogatories, Admissions and Production of Documents served August 19, 2024.

- Depositions:

- The deposition of William Murdock, E3 NV, LLC's principal, was taken by Plaintiff on July 22, 2024.
- Defendant E3 NV LLC took the depositions of Emily Leonard, Anthony Leonard, and Blockleaf LLC's 30(b)(6) witness.

- Expert Disclosures:

- The parties have each made expert and rebuttal expert disclosures.

(b) **Discovery that remains to be completed:** The discovery that remains to be completed includes the following primary items:

- Depositions of two experts, only.

(c) **Reasons why deadline not satisfied or remaining discovery not completed:** Plaintiffs and Defendants have almost completed discovery, with only two expert depositions remaining. The parties would like to postpone such depositions and engage in a settlement conference, or a private mediation if a settlement conference cannot be scheduled before the end of 2024. The parties would like to extend the deadline to complete these two expert depositions, only, until January 31, 2024 to avoid the costs of such depositions and allow the settlement conference the greatest chance of success.

THEREFORE, IT IS HEREBY STIPULATED AND AGREED between the Parties, by and through their respective attorneys of record, that the below-listed proposed schedule should govern this case:

Discovery Cut-Off (for two remaining depositions, only) January 31, 2025, all other discovery must be completed by November 21, 2024.

Dispositive Motions – March 2, 2025

Proposed Joint Pretrial Order – April 1, 2025, or 30 days after the final dispositive motions is ruled upon.

Furthermore, the Parties shall participate in a settlement conference or a private mediation as soon as possible, ideally prior to December 31, 2024.

1 IT IS SO STIPULATED.

2 DATED this 31 day of October, 2024.

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Counsel for Defendants

IT IS SO ORDERED.

Raymond J. Zouchak
U.S. MAGISTRATE JUDGE

Date: November 1, 2024

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25 [Proposed Order on following page]
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